

Exhibit 9

IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION MDL No. 2804  
Case No.  
17-mdl-2804  
Judge Dan Polster

This document relates to:  
The County of Cuyahoga, Ohio, et al., v.  
Purdue Pharma L.P., et al.,  
Case No. 1:17-OP-45004 (N.D. Ohio)

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Videotaped deposition of
WILLIAM DENIHAN
January 30, 2019
9:02 a.m.

Taken at:
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ALSO PRESENT:

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1 Q. Do you agree that as of February
2 2007, at least by that date, it was appropriate
3 to refer to trends in opiate and opioid-related
4 overdose and abuse as an epidemic?

5 MS. SACKS: Objection.

6 A. So I don't know if I'm qualified to
7 agree. I don't know how to answer that,
8 candidly. I don't know if I'm qualified at
9 that point, 2007. My expertise and area was
10 mental health, and we had yet to consolidate
11 with the alcohol and drug board.

12 Q. In any event, whether it
13 technically would qualify under epidemiological
14 standards as an epidemic, you knew that as of
15 February 2007, people in Ohio and Cuyahoga
16 County were referring to trends of opioid abuse
17 and overdose in the county as an epidemic,
18 correct?

19 A. I would say that's correct.
20 Somebody in our field was saying it, yes.

21 Q. We're making good time.

22 A. Well, I'm glad to hear that.

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24 (Thereupon, Deposition Exhibit 10,
25 Designated Confidential, 1/17/2013